

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

NATIONAL BOARD OF MEDICAL EXAMINERS)
3750 Market Street)
Philadelphia, Pennsylvania 19104,)
and)
FEDERATION OF STATE MEDICAL BOARDS)
400 Fuller Wiser Road, Suite 300)
Euless, Texas 76039-3855)
Plaintiffs,)
v.) Civil Action No. _____
OPTIMA UNIVERSITY LLC)
1774 Highway 22)
McKenzie, Tennessee 38201,)
EIHAB MOHAMED SULIMAN)
1774 Highway 22)
McKenzie, Tennessee 38201, and)
JOHN DOES 1-10,)
Defendants.)

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

Plaintiffs the National Board of Medical Examiners (“NBME”) and the Federation of State Medical Boards (the “Federation”) (collectively, “Plaintiffs”) hereby allege as follows:

NATURE OF ACTION

1. This is a copyright infringement action for damages and injunctive relief against defendants Optima University LLC (a/k/a Optima USMLE Review) (“Optima”); its owner, Eihab Mohamed Suliman (a/k/a Eihab Sullivan, Sihab M. Suliman, Eihab M. Ebrahim, Eihab Brahim, and Eihab M. Ibrahim) (“Suliman”); and John Does 1-10 (“Doe Defendants”) (collectively, “Defendants”). Three causes of action are asserted: direct copyright infringement, contributory copyright infringement, and vicarious liability for copyright infringement by others.

THE PARTIES

2. NBME is a not-for-profit organization that provides examinations for the health professions. Its mission is to help protect the public through state-of-the-art assessment of the knowledge and skills of prospective health care providers. The NBME was founded in 1915 because of the need for a voluntary, nationwide examination system that medical licensing authorities could use as a common standard by which to evaluate candidates for medical licensure.

3. The Federation is a non-profit organization established in 1912 and representing the 70 state medical boards of the United States and its territories. The Federation's mission is to continuously improve the quality, safety and integrity of health care through developing and promoting high standards for physician licensure and practice.

4. The NBME and the Federation own and sponsor the United States Medical Licensing Examination® (“USMLE”), which is a standardized examination that is used in evaluating applicants for medical licensure in the United States. The USMLE is designed to assess a physician's ability to apply knowledge, concepts, and principles --